

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: FIELDWOOD ENERGY LLC, <i>et al.</i>, Debtors.¹	§ § § § § § §	Chapter 11 Case No. 20-33948 (MI) (Jointly Administered)
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**DECLARATION OF ERIN M. CHOI IN SUPPORT OF DEBTORS' EMERGENCY
MOTION TO COMPEL BP EXPLORATION & PRODUCTION INC. TO PERFORM
PRE-PETITION CONTRACTS**

I, Erin M. Choi, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a senior associate of the firm Weil, Gotshal & Manges LLP (“Weil”), which maintains an office for the practice of law at 700 Louisiana Street, Suite 1700, Houston, Texas 77002. I am an attorney at law, duly admitted and in good standing to practice in the State of Texas and is admitted to practice before the U.S. District Courts for the Northern, Southern, and Eastern Districts of Texas. I have made an appearance in the above-captioned chapter 11 cases to represent Fieldwood Energy LLC (“**Fieldwood**”) and its debtor affiliates, as debtors and debtors in possession (collectively, the “**Debtors**”).

2. I submit this Declaration in support of Debtors’ Emergency Motion to Compel BP Exploration & Production Inc. (“**BP**”) to Perform Pre-petition Contracts (“**Motion to Compel**”), filed concurrently herewith in the above-captioned proceeding.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Fieldwood Energy LLC (6778), Fieldwood Energy Inc. (4991), Fieldwood Onshore LLC (3489), Fieldwood SD Offshore LLC (8786), Fieldwood Energy Offshore LLC (4494), Fieldwood Offshore LLC (2930), GOM Shelf LLC (8107), FW GOM Pipeline, Inc. (8440), Galveston Bay Procession LLC (5703), Galveston Bay Procession LLC (0422), Fieldwood Energy SP LLC (1971), Dynamic Offshore Resources NS, LLC (0158), Bandon Oil and Gas, LP (9266), and Bandon Oil and Gas GP, LLC (9172). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. Attached as Exhibit A is a true and correct copy of the Galapagos Area Loop Subsea Production System Construction and Operating Agreement, dated December 1, 2011, and all exhibits and amendments thereto (“**LSPS OA**”).

4. Attached as Exhibit B is a true and correct copy of the Production Handling and Operating Services Agreement, dated September 21, 2010, and all exhibits and amendments thereto (“**PHA**”).

5. Attached as Exhibit C is a true and correct copy of the U.S. Department of the Interior’s Order No. 3395, dated January 20, 2021 (“**DOI Order**”).

6. Attached as Exhibit D is a true and correct copy of Debtors’ email to BP, dated January 21, 2021.

7. Attached as Exhibit E is a true and correct copy of Debtors’ Letter to BP, dated January 24, 2021.

8. Attached as Exhibit F is a true and correct copy of BP’s Letter to Debtors, dated January 26, 2021.

9. Attached as Exhibit G is a true and correct copy of Debtors’ Letter to BP, dated November 3, 2020.

10. I hereby declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: January 27, 2021
Houston, Texas

/s/ Erin M. Choi
Erin M. Choi